

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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In re	: Chapter 9
	:
CITY OF DETROIT, MICHIGAN,	: Case No. 13-53846
	:
Debtor.	: Hon. Steven W. Rhodes
	:
-----X	

**STIPULATION FOR AN ORDER RESOLVING CORRECTED
MOTION OF THE OFFICIAL COMMITTEE OF RETIREES FOR ENTRY
OF AN ORDER ALLOWING AN ADMINISTRATIVE EXPENSE CLAIM**

The Official Committee of Retirees (the "Retiree Committee") and the City of Detroit (the "City" and, together with the Retiree Committee, the "Parties"), by and through each of their undersigned counsel, stipulate as follows:

1. On February 7, 2014, the Retiree Committee filed the Corrected Motion of the Official Committee of Retirees for Entry of an Order Allowing an Administrative Expense Claim (Docket No. 2660) (the "Motion"). The Motion amended and superseded the Motion of the Official Committee of Retirees for Entry of an Order Allowing an Administrative Expense Claim (Docket No. 2656), filed by the Retiree Committee on February 6, 2014.

2. On February 20, 2014, the City filed the Debtor's Objection to Corrected Motion of Official Committee of Retirees for Entry of an Order

Allowing an Administrative Expense Claim and an accompanying brief in opposition (Docket Nos. 2705 and 2706) (together, the "Objection").

3. On February 28, 2014, the Retiree Committee filed the Reply in Support of Motion of the Official Committee of Retirees for an Order Allowing an Administrative Expense Claim and in Response to City's Opposition Thereto (Docket No. 2782) (the "Reply").

4. The Court conducted an initial hearing with respect to the relief requested in the Motion on March 5, 2014, at 10:00 a.m., Eastern Time (the "Hearing").

5. Following the Hearing, the Parties have resolved the Motion, the Objection and the Reply pursuant to the terms of the settlement agreement attached hereto as Exhibit 1 (the "Settlement Agreement").

6. On March 25, 2014, the Parties filed the Stipulation for an Order Authorizing the City and the Retiree Committee to File Under Seal Settlement Agreement Resolving Corrected Motion of the Official Committee of Retirees (Docket No. 3174) jointly requesting that the Court authorize the filing under seal of the Settlement Agreement. On March 26, 2014, the Court entered an order (Docket No. 3232) authorizing the filing under seal of the Settlement Agreement.

7. The Parties have agreed to, and request that the Court enter, the proposed Order attached hereto as Exhibit 2 approving this Stipulation and the Settlement Agreement.

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Dated: March 28, 2014

/s/ Sam J. Alberts

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ATTORNEYS FOR THE CITY

EXHIBIT 1

[FILED UNDER SEAL]

EXHIBIT 2

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**ORDER RESOLVING CORRECTED MOTION OF THE
OFFICIAL COMMITTEE OF RETIREES FOR ENTRY OF AN
ORDER ALLOWING AN ADMINISTRATIVE EXPENSE CLAIM**

This matter came before the Court on the Corrected Motion of the Official Committee of Retirees for Entry of an Order Allowing an Administrative Expense Claim (Docket No. 2660) (the "Motion"), filed by the Official Committee of Retirees (the "Retiree Committee"); the City of Detroit (the "City" and, together with the Retiree Committee, the "Parties") having filed the Debtor's Objection to Corrected Motion of Official Committee of Retirees for Entry of an Order Allowing an Administrative Expense Claim and an accompanying brief in opposition (Docket Nos. 2705 and 2706) (together, the "Objection"); the Retiree Committee having filed the Reply in Support of Motion of the Official Committee of Retirees for an Order Allowing an Administrative Expense Claim and in Response to City's Opposition Thereto (Docket No. 2782); the Court having

reviewed the Motion, the Objection and the Reply and having considered the statements of counsel and the evidence adduced with respect to the Motion at a hearing before the Court (the "Hearing"); the Parties having jointly filed the Stipulation for an Order Resolving Corrected Motion of the Official Committee of Retirees for Entry of an Order Allowing an Administrative Expense Claim (the "Stipulation"); the Court having entered an order (Docket No. 3232) authorizing the filing under seal of the Settlement Agreement attached as Exhibit 1 to the Stipulation; the Court being advised that the Parties have resolved the Motion, the Objection and the Reply according to the terms of the Settlement Agreement; the Court finding that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b), and (c) notice of the Motion and the Hearing was sufficient under the circumstances; and the Court otherwise being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The Motion, the Objection and the Reply are RESOLVED, and the Stipulation and the Settlement Agreement are approved.

CERTIFICATE OF SERVICE

I, Heather Lennox, hereby certify that the foregoing Stipulation for an Order Resolving Corrected Motion of the Official Committee of Retirees for Entry of an Order Allowing an Administrative Expense Claim was filed and served via the Court's electronic case filing and noticing system on this 28th day of March, 2014.

/s/ Heather Lennox _____